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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON
9 SPOKANE DIVISION

10 LUCAS M. CHANEY, individually, and as
11 guardian ad litem for TC, a minor, and
12 KATHLEEN CHANEY,

Plaintiffs,

13 vs.

14 AUTO TRACKERS AND RECOVERY
15 NORTH LLC, PATRICK K. WILLIS
16 COMPANY, INC., and SANTANDER
CONSUMER USA INC.,

17 Defendants.
18

19 PATRICK K. WILLIS COMPANY, INC.,
20 a California corporation,

21 Cross-Claim Plaintiff,

22 vs.

23 AUTO TRACKERS AND RECOVERY
24 NORTH LLC, an Idaho limited liability
25 company,

26 Cross-Claim Defendant.

Case No. 2:19-cv-00272-SAB

DECLARATION OF TREVOR R.
PINCOCK IN SUPPORT OF
PATRICK K. WILLIS COMPANY
INC.'S MOTION FOR PARTIAL
SUMMARY JUDGMENT AGAINST
AUTO TRACKERS AND
RECOVERY NORTH LLC

DECLARATION OF TREVOR R. PINCOCK: 1

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
Fax: (509) 747-2323

1 I, TREVOR R. PINCOCK, hereby make the following declaration:

2 1. I am over the age of 18 years and competent to provide testimony.

3 The following statements are based on my own personal knowledge.

4 2. I am an attorney for Defendant and Cross-Claim Plaintiff Patrick K.
5 Willis Company, Inc. ("PK Willis").
6

7 3. Attached hereto as **Exhibit A** is a true and correct copy of Auto
8 Trackers and Recovery North LLC's Answers to PK Willis's First Set of Requests
9 for Admission.

10 I certify and declare under penalty of perjury of the laws of the United States
11 of America that the foregoing is true and correct to the best of my knowledge.

12 EXECUTED this 16th day of December at Spokane, Washington.
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15 /s/ Trevor R. Pincock
16 TREVOR R. PINCOCK
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DECLARATION OF TREVOR R. PINCOCK: 2

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of December, 2020, I served the foregoing to the following:

Alexander B. Trueblood
Trueblood Law Firm
1700 Seventh Ave., Suite 2100
Seattle, WA 98101-1360
alec@hush.com

☐ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (FAX)
☒ Via ECF / email

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☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (FAX)
☒ Via ECF / email

Attorneys for Defendant Auto Trackers and
Recovery North LLC



MARIANNE LOVE, Legal Assistant

DECLARATION OF TREVOR R. PINCOCK: 3

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